

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
CLERKS OFFICE
2004 JUN 22 P 3:21

PATRICK L. MCGUINNESS,

Plaintiff,

v.

TXU ENERGY SOLUTIONS LP and
SCOTT HARRISON,

Defendants.

Civil Action No. 04 CV 11170 JLT

FILING FEE PAID:
RECEIPT # 56827
AMOUNT \$ 30.00
BY BPTV CLK
DATE 6/22/04

MOTION FOR ADMISSION PRO HAC VICE
OF W. STEPHEN COCKERHAM

In accordance with Local Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, Gregory A. Manousos, an attorney admitted to practice before this Court, hereby moves that this Honorable Court admit *pro hac vice* Attorney W. Stephen Cockerham, for the purpose of serving as co-counsel in the above-captioned case. In support of this motion, the undersigned attorney submits herewith the Affidavit of W. Stephen Cockerham, and states that he will act as co-counsel of record in this matter.

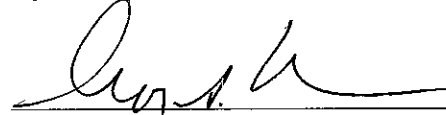
Gregory A. Manousos, an attorney with the firm Morgan, Brown & Joy, LLP, One Boston Place, Boston, MA 02108, (617) 523-6666 and a member of the bar of this Court, supports this application and shall also appear on behalf of the Defendants. Mr. Manousos and his firm will receive service of pleadings, documents and communications from Plaintiff's counsel and the Court on behalf of the Defendants.

A proposed Order is attached hereto.

WHEREFORE, the undersigned counsel respectfully requests that this Honorable Court admit *pro hac vice* Attorney W. Stephen Cockerham, for purpose of the above-captioned litigation.

Respectfully Submitted,

TXU ENERGY SOLUTIONS COMPANY,
LP AND SCOTT HARRISON
By their Attorneys

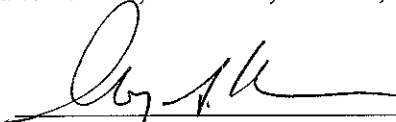


Gregory A. Manousos, BBO # 631455
Morgan, Brown & Joy, LLP
One Boston Place
Boston, MA 02108
(617) 523-6666

Dated: June 22, 2004

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon attorney for plaintiff, Paul A. Manoff, Attorney at Law, 47 Winter Street, 4th Floor, Boston, MA 02108, by first class mail, on this 22nd day of June, 2004.



Gregory A. Manousos